August 11, 2006

- To: CenturyTel of Cowiche, Inc.
- From: Bob Shirley, Telecommunications Policy Analyst (360) 664-1292
- Re: Request for Supplemental Filing of ETC Certifications and Reports Docket UT-063052

- - VIA Electronic Mail - -

After review of CenturyTel of Cowiche, Inc.'s ETC certification and reports, commission staff has concluded that the filing is inconsistent with the requirements of WAC 480-123-020 through 080. Please file a replacement or supplement consistent with the attachment to this e-mail.

Certifications are due to the Federal Communications Commission and the Universal Service Administrative Company not later than October 1. Commission staff plans to request commission approval of certifications at the open meeting scheduled for September 13. In order to make a recommendation on September 13, commission staff will need to receive replacement or supplemental filings not later than August 22. Commission staff will work closely with CenturyTel of Cowiche, Inc. and its representatives so that filings can be completed not later than August 22.

Please contact me by e-mail at <u>bshirley@wutc.wa.gov</u> or by calling (360) 664-1292 if you have questions. Thank you.

Attachment: ETC Certification and Report Request

cc: Records Center, UT-063052

ATTACHMENT

CenturyTel of Cowiche, Inc. ETC Certification and Report Request

WAC 480-123-060(1)

CenturyTel of Cowiche, Inc. needs to provide a certification that states that it *will* use *federal high-cost universal service fund support* only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended.

The rule requires an ETC seeking certification to state "that it will use federal high-cost universal service fund support only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended." The submitted certification limits the certification to funds from sources described in 47 C.F.R. § 54.314. Because that meaning of the phrase "federal high-cost universal service fund" is broader than "funds from sources described in 47 C.F.R. § 54.314," the rule requires a certification broader than one tied to 47 C.F.R. § 54.314.

WAC 480-123-070(1)(a)

CenturyTel of Cowiche, Inc. needs to provide a copy of the NECA-1 Report.

CenturyTel of Cowiche, Inc. refers to the NECA-1 report, but failed to attach a copy to the filing dated August 4, 2006. The commission cannot review an attachment that it does not have.

WAC 480-123-070(4)

CenturyTel of Cowiche, Inc. needs to specify a number, e.g., zero, for the number of complaints.

The Company stated, ". . . not aware of any complaints" to the FCC or the Attorney General. The rule requires companies to state "the number of complaints that the ETC's customers made to the federal communications commission, or the consumer protection division of the office of the attorney general of Washington."